

## **EXHIBIT B**

**James Mitchell**

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**From:** Christopher Lee  
**Sent:** Thursday, June 13, 2024 12:05 PM  
**To:** James Mitchell  
**Subject:** FW: MPH v. Apple

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**From:** Malloy, Ryan J. <RMalloy@mofo.com>  
**Sent:** Wednesday, June 12, 2024 6:46 PM  
**To:** Rahebi, Bita <BRahebi@mofo.com>; Christopher Lee <clee@leesheikh.com>  
**Cc:** Carol Koski <ckoski@leesheikh.com>  
**Subject:** Re: MPH v. Apple

Chris,

MPH may describe its motion as “unopposed” so long as MPH includes the complete position statement that Bita Rahebi provided in her June 10 email.

Ryan Malloy  
Morrison & Foerster LLP  
(213) 892-5482

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**From:** Rahebi, Bita <BRahebi@mofo.com>  
**Sent:** Wednesday, June 12, 2024 2:50:15 PM  
**To:** Christopher Lee <clee@leesheikh.com>  
**Cc:** Carol Koski <ckoski@leesheikh.com>; Malloy, Ryan J. <RMalloy@mofo.com>  
**Subject:** Re: MPH v. Apple

Chris, I am copying Ryan as I just boarded a flight and he can get back to you.

On Jun 12, 2024, at 2:38 PM, Christopher Lee <clee@leesheikh.com> wrote:

**External Email**

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Bitá:

Thanks for your email.

The first issue was addressed in our motion filed yesterday and granted today.

I write to seek clarification on the second issue. You state that “Apple declines to **stipulate** to MPH’s request for another CMC,” presumably because I asked whether Apple would stipulate to having a case management conference in our initial call.

MPH intends to proceed with the motion for such a conference shortly, and would like to know if the motion can be filed as “unopposed” as we did with the motion filed yesterday even if Apple will not stipulate to the proposed conference. We will obviously include in the motion Apple’s position.

Thanks.

Christopher J. Lee  
Lee Sheikh & Haan LLC  
125 South Clark Street, Suite 1175 | Chicago, Illinois 60603  
General: (312) 982-0070 | Direct: (312) 982-0061  
Website: [IPLitigation.com](http://IPLitigation.com)

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AV Peer Review Rated, Martindale-Hubbell

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**From:** Rahebi, Bita <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)>  
**Sent:** Monday, June 10, 2024 3:50 PM  
**To:** Christopher Lee <[clee@leesheikh.com](mailto:clee@leesheikh.com)>  
**Cc:** Carol Koski <[ckoski@leesheikh.com](mailto:ckoski@leesheikh.com)>  
**Subject:** RE: MPH v. Apple

Chris,

I know we were both out of the office when we spoke on Friday. For reference, these are the prior position statements:

**Issue #1: Magistrate Judge**

Apple defers to the Court’s preference on this issue. In view of its familiarity with this case, the patents, and MPH’s prior motions, Apple believes that the Court is well equipped to resolve the pending discovery disputes.

**Issue #2: Further CMC**

Apple notes that the Court already set a complete schedule for the case through trial (ECF No. 83). Apple defers to the Court on its management of the case. For these reasons, Apple declines to stipulate to MPH’s request for another CMC.

**Issue #3: Expedited briefing on motions related to issue number 1 and 2.**

Apple opposes the motion for expedited briefing.

Best,  
Bita

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**From:** Christopher Lee <[clee@leesheikh.com](mailto:clee@leesheikh.com)>  
**Sent:** Thursday, June 6, 2024 8:49 AM  
**To:** Rahebi, Bita <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)>  
**Cc:** Carol Koski <[ckoski@leesheikh.com](mailto:ckoski@leesheikh.com)>  
**Subject:** RE: MPH v. Apple

**External Email**

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Sure thing.

Christopher J. Lee  
Lee Sheikh & Haan LLC  
125 South Clark Street, Suite 1175 | Chicago, Illinois 60603  
General: (312) 982-0070 | Direct: (312) 982-0061  
Website: [IPLitigation.com](http://IPLitigation.com)

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**From:** Rahebi, Bita <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)>  
**Sent:** Wednesday, June 5, 2024 11:00 PM  
**To:** Christopher Lee <[clee@leesheikh.com](mailto:clee@leesheikh.com)>  
**Cc:** Carol Koski <[ckoski@leesheikh.com](mailto:ckoski@leesheikh.com)>  
**Subject:** RE: MPH v. Apple

Hi Chris,

11:10 works for me. Do you want to give me a ring at the below? It should roll over to my cell.

**Bita Rahebi**  
Partner | Co-Chair, Global Intellectual Property Litigation Practice  
[brahebi@mofo.com](mailto:brahebi@mofo.com)  
T. +1 (213) 892-5428

**MORRISON  
FOERSTER**

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**From:** Christopher Lee <[clee@leesheikh.com](mailto:clee@leesheikh.com)>  
**Sent:** Wednesday, June 5, 2024 6:53 PM  
**To:** Rahebi, Bita <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)>  
**Cc:** Carol Koski <[ckoski@leesheikh.com](mailto:ckoski@leesheikh.com)>  
**Subject:** Re: MPH v. Apple

**External Email**

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I am out of the office then, but could make 11:10-11:30 am PT work.

Thanks.

Chris

Sent iPhone

On Jun 5, 2024, at 7:38 PM, Rahebi, Bita <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)> wrote:

Hi Chris, sorry, I was tied up in meetings. Does 10:30-11:30 pacific tomorrow work for you?

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**From:** Christopher Lee <[clee@leesheikh.com](mailto:clee@leesheikh.com)>  
**Sent:** Wednesday, June 5, 2024 2:07 PM  
**To:** Rahebi, Bita <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)>  
**Subject:** Re: MPH v. Apple

**External Email**

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Yes. I can talk after 2:30 pm PT.

Chris

Sent iPhone

On Jun 5, 2024, at 12:19 PM, Rahebi, Bita <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)> wrote:

Hi Chris, time to connect today?

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**From:** Christopher Lee <[clee@leesheikh.com](mailto:clee@leesheikh.com)>  
**Sent:** Friday, May 31, 2024 12:50 PM  
**To:** Rahebi, Bita <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)>  
**Cc:** Carol Koski <[ckoski@leesheikh.com](mailto:ckoski@leesheikh.com)>  
**Subject:** Re: MPH v. Apple

**External Email**

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Bita:

Thanks for the prompt response. I have a doctor's appointment at 10 am PT on Monday. Can you do 9:30 PT or later in the afternoon (say, after 1 pm PT)?

Chris

Sent iPhone

On May 31, 2024, at 10:00 AM, Rahebi, Bita <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)> wrote:

Hi Chris,

Sure. How is 10 a.m. pacific on Monday?

Bita

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**From:** Christopher Lee <[clee@leesheikh.com](mailto:clee@leesheikh.com)>  
**Sent:** Friday, May 31, 2024 6:17 AM  
**To:** Rahebi, Bita <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)>  
**Cc:** Carol Koski <[ckoski@leesheikh.com](mailto:ckoski@leesheikh.com)>  
**Subject:** MPH v. Apple

**External Email**

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Bita:

Are you available for a short call this afternoon (after 2 pm PT) or on Monday to discuss a couple of case management issues?

Thanks.

Christopher J. Lee  
LEE SHEIKH & HAAN  
125 South Clark Street, Suite 1175  
Chicago, Illinois 60603  
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